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04-CV-05539-DECL.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

11 **ROLANDO HERNANDEZ,**

12 Plaintiff,

13 v.

14 **CITY OF VANCOUVER and MARK**
15 **TANNINEN,**

16 Defendants.

No. C04-5539 FDB

**PLAINTIFF'S REQUIRED
DISCLOSURES PURSUANT TO FRCP
RULE 26(a)(1)**

17 A. The following individuals are believed to have discoverable information that the
18 disclosing party may use to support his claims:

- | | | | | |
|----|----|-----------|---|---|
| 19 | 1. | Name | : | Rolando Hernandez |
| 20 | | Address | : | 4015 NE 97th
Vancouver, WA 98665 |
| 21 | | Telephone | : | 360.904.5213 |
| 22 | 2. | Name | : | Kendra Hernandez |
| 23 | | Address | : | 555 Esther Shore St.
Vancouver, WA 98665 |
| 24 | | Telephone | : | 360.694.1318 |
| 25 | | | | |
| 26 | | | | |

1 3. Name : Gregory D. Ferguson
2 Address : Suite 500
3 601 Main Street
 Vancouver, WA 98660
4 Telephone : 360.906.1167
5 4. Name : John Waudby
6 Address : 15208 NE 12th St.
7 Vancouver, WA 98684
8 Telephone : 360.892.3684
9 5. Name : Brian Severns
 Address : c/o 3645 SE 32nd Ave.
10 Portland, OR 97202
11 Telephone : 503.238.5550
12 6. Name : Brian Wilson
13 Address : 12001 NE Plantation Road
14 Vancouver, WA 98685
15 Telephone : 360.576.6970

16 B. Documents that plaintiff may use to support his claims are:

17 1. Medical records (copies of medical records, attorney for plaintiff), are
18 enclosed. Individual medical providers may have additional medical records.

19 2. Miscellaneous employment records, which are in the custody of
20 defendant City of Vancouver.

21 C. Plaintiff's present computation of damages:

22 1. Plaintiff's computation of damages due to lost wages and benefits is
23 summarized on a chart delivered to defendants herewith. Plaintiff's attorney has available to
24 defendants the documents used to develop the chart.

2. Plaintiff's claim for reimbursable medical expenses is evidenced in the medical billings, which are in the possession of the individual caregivers. Plaintiff will produce the records upon request from defendants.

Plaintiff reserves the right to supplement these disclosures and incorporates by reference any documents later produced by plaintiff in response to specific discovery requests from defendants.

DATED: February 10, 2005.


Thomas S. Boothe, WSBA No. 21759
Attorney for Plaintiff

Hernandez (Required Disclosures)

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PLAINTIFF'S REQUIRED DISCLOSURES PURSUANT TO FRCP RULE 26(a)(1)** on the following named person(s) on the date indicated below by

☒ mailing with postage prepaid

☐ hand delivery

☐ facsimile transmission

☐ overnight delivery

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at their last-known address(es) indicated below.

Ms. Debra Y. B. Quinn
City of Vancouver
PO Box 1995
Vancouver, WA 98668-1995

DATED: February 10, 2005.



Jill Kilpatrick
Legal Assistant to Thomas S. Boothe